



05-03

cc: 520  
022  
030  
10  
20  
30  
40

Samuel Shapiro & Company, Inc.

CUSTOMS BROKERS/INTERNATIONAL FREIGHT FORWARDERS

August 21, 2003

Honorable Bryant L. Van Brakle  
Secretary  
Federal Maritime Commission  
800 North Capitol Street, N. W.  
Washington, D.C. 20573

RECEIVED  
03 AUG 26 PM 3:14  
FEDERAL MARITIME COMMISSION

RE: Petition of National Customs Brokers and Forwarders Association of America, Inc. for a Limited Exemption From Certain Tariff Requirements of the Shipping Act of 1984

Petition No. 03 –

Dear Secretary Van Brakle:

I am James Shapiro, Vice President of Transportation for Samuel Shapiro & Company, Inc. We are a Baltimore based International Freight Forwarder and Customs Broker. We also act as an NVOCC under OTI number 17NF. We have 8 offices on the east coast of the United States and a worldwide network of foreign agents that work closely with our company. I want to call to your attention some of the costs associated with tariff filing.

1. Establishing a tariff website has an approximate cost of \$ 5,000.00
2. The annual cost of subscribing to a tariff publishing service is approximately \$ 5000.00
3. We spend approximately 15-20 hours each month in maintaining the tariff website or making changes to tariff. This results in a cost of approximately \$500.00 - \$ 750.00 per month.

We cannot track the number of times shippers or other persons have accessed our tariff.

I would estimate that 75% of the time rates are separately negotiated with shippers as opposed to already being in our tariff.



Samuel Shapiro & Company, Inc.

CUSTOMS BROKERS/INTERNATIONAL FREIGHT FORWARDERS

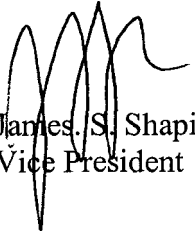
---

I believe rate tariffs are not useful because the market changes constantly. The archaic rules for increasing rates and surcharges are not in step with the marketplace. We do not have flexibility. Air freight is a fluid market and the fact that you don't have to file rates has made air freight very competitive. I don't feel that removing tariff filing will create havoc in the industry.

At present there is no need to file rates if cargo moves in or out of the USA via Canada or Mexico. Rates are also not filed if shipments are made off shore and do not touch U.S. soil. There is no rate filing process overseas except for shipments destined to or from the USA. Why does the FMC deem it necessary to have rates filed when there are exceptions to the system. It's a requirement that needs to be changed.

I, James S. Shapiro declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on August 21, 2003



James S. Shapiro  
Vice President